

TCEQ Comments on EPA Texas Emissions Data Extract for Human Exposure Model

The TCEQ appreciates the opportunity to review and comment on EPA's data extract prior to using the data in the Human Exposure Model. The TCEQ has the following comments on the EPA data extract.

1. Use emissions from one calendar year.
 - a. The EPA data is a mixture of 2011, 2014, and 2017 emissions data, and is not representative of actual annual routine emissions for any individual calendar year. If the modeling is not intended to be representative of one calendar year, that should be clearly communicated when interacting with stakeholders.
2. Update sites' emissions to match company-submitted revisions.
 - a. The TCEQ has received emissions revisions for Eastman and Shell Technology that are provided in the attached spreadsheets. These emissions reflect the best available data at this time and should be incorporated into the EPA's modeling.
3. Update emissions that EPA added to existing TCEQ records.
 - a. Some of the emissions in the attached spreadsheet appear to be due to EPA emissions augmentation, where the EPA adds trace species emissions to existing company-reported records.
 - i. For companies that have submitted emissions revisions, the augmented EPA emissions need to be updated accordingly.
 - ii. In other cases, EPA added emissions species that cause volatile organic compound emissions to exceed TCEQ-reported values. EPA should correct these augmentation records.
4. Update emissions point parameters and coordinates as noted.
 - a. Updated TCEQ emissions point parameters and coordinates are provided in the attached spreadsheet.
5. Provide more information about certain sources so that TCEQ can verify the EPA emissions data.
 - a. Some of the EPA's emissions units are in the TCEQ emissions inventory but are not linked to the emissions points EPA provides in the file. Specifically, at the Indorama/Huntsman site, the sources are in the TCEQ database (nine furnaces in the A-3 Cracking Unit), but the associated emissions paths are not.
 - b. None of the EPA emissions for these units can be found in the TCEQ's database.